

**IN THE UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF WISCONSIN  
MILWAUKEE DIVISION**

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JEL MANUFACTURING LLC,	) Case No.: _____
	)
	)
Plaintiff,	)
	)
v.	) Formerly Case No. 2020CV005478
	) Milwaukee County Circuit Court
	)
SELECTIVE INSURANCE COMPANY OF THE	)
SOUTHEAST,	) <b>PETITION FOR REMOVAL</b>
	)
Defendant.	)
	)

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The Defendant, Selective Insurance Company of the Southeast, by its attorneys, BORGELT, POWELL, PETERSON & FRAUEN, S.C. pursuant to 28 U.S.C. § 1446, 28 U.S.C. § 1332(a) and 28 U.S.C. § 1441, *et seq.*, hereby submits this Petition for Removal of this action from the Circuit Court of Milwaukee County, Wisconsin, to the United States District Court for the Eastern District of Wisconsin. In support of this Petition for Removal, the Defendant states as follows:

1. Selective Insurance Company of the Southeast has been named as a Defendant in this action, which was filed on September 16, 2020 in the Circuit Court of Milwaukee County, Wisconsin. The case is entitled *JEL Manufacturing LLC v. Selective Insurance Company of the Southeast*. and has been designated as Milwaukee County Case No. 2020CV005478.
2. In accordance with 28 U.S.C. § 1446(a), attached as Exhibit 1 is a copy of the Summons and Complaint served upon Selective Insurance Company of the Southeast. Also

attached are exhibits A-F to the Summons and Complaint. The Summons and Complaint, along with Exhibits A-F, constitute all pleadings and Orders that have been served upon the Defendant.

3. Selective Insurance Company of the Southeast was served with the Summons and Complaint on September 24, 2020. Accordingly, this Petition for Removal is timely pursuant to 28 U.S.C. 1446(b)(2)(B) because it has been filed within thirty (30) days after Selective Insurance Company of the Southeast was served with the Summons and Complaint. The service of the Summons and Complaint was Selective Insurance Company of the Southeast's first notice regarding the filing of this action.

4. The subject action is a civil action of which this court has original jurisdiction pursuant to 28 U.S.C. § 1332(a), and is one which may be removed to this court by the Defendants pursuant to 28 U.S.C. § 1441. These provisions are met because this is a civil action between citizens of different states and the amount of controversy exceeds the sum or value of \$75,000, exclusive of interest and costs.

5. The Plaintiff, JEL Manufacturing LLC, is a Wisconsin Limited Liability Company with its principle place of business located at 3073 South Chase Avenue, Bldg. 35, Milwaukee, Wisconsin, 53207.

6. The Defendant, Selective Insurance Company of the Southeast, is an Indiana corporation with its principle place of business in New Jersey.

7. Written notice of the filing of this Petition for Removal has been served upon all parties.

8. A Notice stating that this matter has been removed to Federal Court has been filed with the Clerk of the Circuit Court of Milwaukee County, Wisconsin.

**WHEREFORE**, the Defendant, Selective Insurance Company of the Southeast, requests that the action currently pending in the State of Wisconsin, Circuit Court for Milwaukee County be removed to this Court and proceed in this Court.

Dated this 22<sup>nd</sup> day of October, 2020.

s/ Frederick J. Strampe  
Frederick J. Strampe  
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the Southeast  
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